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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OF
NON-INFRINGEMENT**

Date: June 8, 2017
Time: 8:00 a.m.
Ctrm: 8, 19th Floor
Judge: The Honorable William Alsup

Trial Date: October 2, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants' Uber Technologies, Inc.,
6 Ottomotto LLC, and Otto Trucking LLC's Motion for Summary Judgment of Non-Infringement.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of
8 U.S. Patent No. 8,836,922 B1, dated September 16, 2014.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of
10 U.S. Patent No. 9,285,464 B2, dated March 15, 2016.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of
12 U.S. Patent No. 9,086,273 B1, dated July 21, 2015.

13 5. Attached hereto as Exhibit 4 are relevant pages from the deposition of Gregory
14 Kintz taken on April 26, 2017.

15 I declare under the penalty of perjury under the laws of the United States that the
16 foregoing is true and correct. Executed this 2nd day of May, 2017, in San Francisco, California.

17
18 /s/ Esther Kim Chang

ESTHER KIM CHANG

19
20
21 **ATTESTATION OF E-FILED SIGNATURE**

22 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
23 Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang
24 has concurred in this filing.

25 Dated: May 2, 2017

/s/ Michael A. Jacobs

Michael A. Jacobs